

REMARKS

This amendment is being filed in response to the Office Action dated April 23, 2003. In that Action, the Examiner objected to Claims 5-8 and 10 as having improper claim dependencies. Claims 1 and 9 were rejected under 35 U.S.C. §102(b) as being anticipated by Koike. Claims 1 and 9 were further rejected under 35 U.S.C. §103(a) as being unpatentable over Koike in view of Kim. Claims 2-4 were indicated as being allowable if properly rewritten.

With respect to the §102(b) rejections, Applicants would respectfully submit that Koike does not anticipate the present invention because that reference fails to teach a card memory device having the claimed features. The device disclosed by Koike is not a portable memory card that is removably inserted into a card reader. To the contrary, Koike shows only a conventional computer processor with DRAM, which is the system memory that is affixed to a "motherboard" of computer system along with the processor, within the closed chassis of the computer.

The DRAM of Koike does not have the form or function of a memory card as that term is understood in the art. The distinction between normal computer memory (RAM) and a memory card may be understood by reference to two standard computing dictionaries. Applicants have attached to this response copies of the definitions of "memory card" from the Microsoft Press Computer Dictionary (Third Edition, 1997), and from the Oxford University Press Dictionary of Computing (Fourth Edition, 1996). In the Microsoft Press definition, it is explained that the memory card is a module which *extends* RAM or hard disk storage capacity. Thus, it is immediately seen as distinct from the main or system RAM of a computer system, which is the essential teaching of Koike. The Microsoft Press definition goes on to note that a memory card can be plugged into a PCMCIA-compliant computer, i.e., the memory card is transportable and removably inserted into a PCMCIA reader. The Oxford University Press definition similarly states that the memory card is an "add-in" card. Koike is not directed to any type of "add-in" card.

This distinction was already in the claim language. Claim 1 as originally filed and each of its dependent claims referred to a card memory device. Notwithstanding the same, Applicants

have amended Claim 1 to indicate that the device is a card per se, for insertion in a card reader, and that the card has input/output connections. These amendments serve to further distinguish Applicants' invention from Koike.

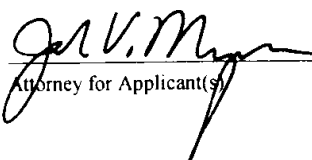
With respect to the §103(a) rejections, the foregoing arguments apply to the proposed combination as well since it is based on Koike. Moreover, since Koike is based on a multiple of boards as used in any personal computer, one "card" cannot form a complete device with I/O units. Thus, one skilled in the art would not be motivated to combine the two teachings. In fact, the definitions above indicate that a memory card is for insertion in a device such as that described by Koike. The proposed combination would only result in inserting a memory card into the computer defined by Koike, which is far more general than the specific invention claimed, which recites the complexities of making a microprocessor and external memories on the memory card itself.

Newly presented Claims 13 to 15 emphasize these distinctions, by reciting that the memories for use by the microprocessor, which are the ones mentioned in Koike, are on-chip in Applicants' claimed card device. Newly presented Claims 16 and 17 emphasize that the memory units and the selector recited in claim 1 are on the card but external to the chip. Thus, the memory units defined by these claims must be different from the memory units discussed in Koike, which is the memory used by the microprocessor and not separate storage. Newly presented Claim 18 recites that the card is flexible. The features of the newly presented claims are disclosed in Applicants' specification, and no new matter has been added. Also, no fee is due for the presentation of the additional claims since the total number of claims is still less than 20 and there are less than 3 independent claims.


For all of the foregoing reasons, Applicants respectfully request reconsideration of the §102(b) and 103(a) rejections.

Applicant has made a diligent effort to advance the prosecution of this application by amending claims, deleting others, and pointing out with specificity how the claims as presented patentably define the invention over the prior art of record. In view of the amendments and remarks set forth herein, the application is believed to be in condition for allowance and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to

resolution through a telephonic interview, the examiner is requested to telephone the undersigned.

I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail in an envelope addressed to: Commissioner for Patents, P.O. Box 1450, Arlington, VA 22313-1450, on August 25, 2003.	
 Attorney for Applicant(s)	<u>Aug 25 2003</u> Date of Signature

Respectfully submitted,


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